

**DEPARTMENT OF HEALTH SERVICES  
TOXIC SUBSTANCES CONTROL PROGRAM****REGION 4**

245 WEST BROADWAY, SUITE 350  
LONG BEACH, CA 90802  
(213) 590-4868



MAY 13 1991

Mr. Robert D. Bush  
Solar Turbines Incorporated  
Harbor Drive Facility  
2200 Pacific Highway  
San Diego, CA 92101

Dear Mr. Bush:

REQUEST FOR EXTENSION TO SUBMIT CLOSURE PLAN, SOLAR TURBINES  
INCORPORATED, HARBOR DRIVE FACILITY (EPA ID NO. CAD008314908)

This is in response to your letter, dated April 9, 1991, requesting an extension to submit a current closure plan by August 15, 1991. Solar Turbines was given 45 days to submit a current closure plan. The deadline was April 23, 1991.

The Department is extremely concerned about the continued delay in this Project. On October 22, 1990, Ronald Okuda of my staff gave Ruth Pullen, Solar Turbines, a copy of our Initial Completeness Checklist indicating that the content of the closure plan was deficient. On January 9, 1991, Ronald Okuda visited the facility and presented to you a draft copy of the Notice of Deficiency (NOD) for the Part B application. The draft NOD specified the items that were deficient in the closure plan. A facility operating under interim status must have a written closure plan as required by the Code of Federal Regulations, Title 40 (40 CFR), Section 265.112(a).

Your letter indicates that you believe that the hazardous waste drum storage area is the only RCRA hazardous waste management unit (HWMU) at the Harbor Drive facility. The January 15, 1987 Operation Plan classifies the "Chapel sump" as a treatment tank where physical separation (precipitation) of hazardous waste occurs. The present tank system does not have secondary containment, therefore Solar Turbines must submit a plan for closure, contingent closure and contingent post-closure as required by 40 CFR 265.197. Also, since leakage of underground storage tanks and a surface release have contaminated the soil and groundwater, a corrective action program is required. The current closure plan is also deficient in addressing State closure requirements.

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In a letter dated January 30, 1991, you notified DHS that you do not intend to apply for an EPA or State permit. Your letter was accepted as notification to initiate closure. The Department is requesting submittal of a current closure plan in order to ensure sufficient time to review and approve the plan prior to expiration of EPA interim status in November 1992 and the State permit in July 1992. The closure plan must include all hazardous waste management units (RCRA and non-RCRA).

Since expiration of Solar Turbines' EPA interim status and the State permit occur within 4 months of each other, review of closure operations for the entire facility would be the most efficient use of time and resources. It is our opinion that Solar Turbines has been given a reasonable time to assemble all the necessary information to address the deficiencies in the closure plan. However, to ensure that the Department receives a technically complete revised closure plan, your request for extension to submit closure is now granted until August 15, 1991. Only a complete closure plan for the entire facility will be accepted. Please note that any further delays to provide the requested information will result in appropriate enforcement action authorized by the law.

The Department would be happy to meet with you and your consultants to answer any questions. If you have any questions, please contact Robert Senga at (213) 590-4882 or Ronald Okuda at (213) 590-4885.

Sincerely,

  
Mohinder S. Sandhu, P.E.  
Branch Chief  
Facility Permitting Branch

cc: James C. Breitlow, Chief ✓  
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